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July 10, 2020

## **VIA ECF**

Honorable Robert W. Lehrburger United States Magistrate Judge Southern District of New York 500 Pearl Street Brooklyn, New York 11201

> Re: De Vanna v. Commissioner of Social Security, Civil Action No. 20-cv-0899

Dear Judge Lehrburger,

We write on behalf of plaintiff, Sabrina De Vanna, and with the consent of the defendant, to request a 45-day extension of time to file plaintiff's motion for judgment on the pleadings. Plaintiff's motion is due on **July 13, 2020**. Plaintiff respectfully requests an extension of time up to and including, **August 10, 2020**. This is plaintiff's first request for an extension of time.

Subject to the approval of the Court, the parties propose the following amended briefing schedule:

- a. Plaintiff to serve her motion for judgment on the pleadings on or before **August 26, 2020**;
- b. Defendant to serve its response/cross-motion on or before **October 25, 2020**; and
- c. Plaintiff to serve her reply (if any) on or before **November 15, 2020**.

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Respectfully submitted,

s/Daniel A. Osborn

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cc: Leslie Ramirez-Fisher, Esq. (by ECF)

SO ORDERED:

7/15/2020

HON, ROBERT W. LEHRBURGER UNITED STATES MAGISTRATE JUDGE